YELLOW 16741

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

VIA OVERNIGHT DELIVERY
RETURN RECEIPT REQUESTED

Bennie Underwood
De Maximis
9041 Executive Park Drive
Suite 401
Knoxville, Tennessee 37923

Re: Saad Trousdale Road Site
3655 Trousdale Road
Nashville, Tennessee

Dear Mr. Underwood:

With this letter, U.S. EPA, Region IV, responds to the proposal of the Saad Site Steering Committee to conclude the removal action at the Saad Site as it has continued under the authority of U.S. EPA and allow the response activities to continue instead under the authority of Tennessee Department of Environment and Conservation (TDEC). As we discussed when the Steering Committee made this proposal in Nashville, neither EPA nor TDEC approves the Steering Committee's recommendation at this time. Currently, the source of the continuing contamination at the Site has not been addressed. Therefore, EPA rejects the assertions of the Steering Committee that the removal activities are complete and that Steering Committee has fully complied with the 1992 Administrative Order on Consent.

Specifically, EPA disagrees with the assertion of the Steering Committee that the existing contamination of the vadose zone is sporadic and not recommended at this time. The Site contains highly contaminated soils that should be removed and treated or properly disposed of. The Tennessee industrial cleanup level for TPH in soils is 250 mg/kg. Of the 37 soil samples taken at the Saad Site, 30 samples indicate TPH levels above 250 mg/kg. These samples indicate significant TPH contamination. Furthermore, contrary to the Steering Committee's suggestion, additional removal activities are not likely to recontaminate above the perched water zone. If free phase contaminants from off-site sources migrate onto the Saad Site, they would move along the top of the perched water table and not significantly recontaminate above the perched water zone.

Additionally, EPA questions the efficiency of the free product collection system which the Steering Committee proposes to address contamination of the perched water table. The heterogeneity of the fill at the Site will reduce the efficiency

of the proposed wells. Recovery trenches are a more efficient method for free phase product recovery. The recovery system also needs to address the approximately 1.5 feet of product detected in well SSS-1 in the Bigby Cannon Limestone. As part of the removal activity at the Site, all contaminated material (source material) above the perched water table must be removed and treated on-Site or disposed of off-Site in an appropriate facility. Until the source is removed, contamination of the perched water will continue and defeat the purpose of any liquid collection system.

EPA also questions the accuracy of the E&E and CSX potentiometric surface maps presented in the Steering Committee's proposal. First, the maps are based on only a few widely-spaced data points. Second, the water level measurements for the E&E map predate the CSX investigation by 9 years. As water levels can vary greatly over 9 years, EPA questions the certainty of the interpreted flow regimes in the Bigby Cannon Limestone for the area that includes the CSX yard, the Saad Site and Croft Spring. Accordingly, the removal activity at the Site must address the contaminated material that has been identified in the berm that supports the railroad tracks on the CSX rail yard. Additionally, EPA recommends a comprehensive water level measurement program to adequately evaluate the potentiometric surface of the Bigby Cannon aquifer and, as the Bigby Cannon appears to be highly solutioned, close evaluation of all measurements.

Finally, EPA rejects the assertion of the Steering Committee that existing contamination at the Saad Site originated off-site. Current data indicates that migration pathways of free phase product on the perched water table is east to west, from the Saad Site to the CSX yard. Cross section A-A" reflects a west to east section from CSX well BH-10 to DRE borehole B-5 on the eastern portion of the Saad Site. According to the cross section, the low permeability clay below the perched water zone dips to the west. The top of the clay layer is 15 lower in elevation in BH-10 than in DRE BH-5 and the approximate gradient is 0.01. Furthermore, I have enclosed a 1979 photograph of the former ponded area on the southwest corner of the Saad Site. Clearly, the photograph illustrates a significant source of contamination at the Site.

In an effort to resolve disputes regarding continuing response activities at the Saad Site and to conclude the removal action required under the 1992 AOC, EPA establishes a deadline of 60 days from the date of your receipt of this letter to have in place an approved work plan addressing completion of the removal action at the Saad Site. If, 60 days after your receipt of this letter, EPA has not approved a work plan for completion of the removal action at the Site, EPA will consider Respondents out of compliance with the AOC and will be forced to consider appropriate options for enforcement. As Elizabeth Davis,

Assistant Regional Counsel, recently discussed with J. Andrew Goddard, Chairman of the Executive Committee, the Office of Regional Counsel and I are available to meet with the Steering Committee to discuss the work plan more specifically.

Please address any legal questions or comments to Elizabeth Davis, Assistant Regional Counsel, at the above address or at (404) 347-2641, extension 2283. Address any technical questions to me at the above address or at (404) 347-3931, extension 6138.

Sincerely yours,

Karen Dixon for

Fred Stroud
On-Scene Coordinator

cc: J. Andrew Goddard